

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

SAN ANTONIO DIVISION

LOGAN PAUL,

Plaintiff,

v.

STEPHEN FINDEISEN AND COFFEE BREAK
PRODUCTIONS LLC D/B/A COFFEEZILLA,

Defendants.

Civil Action No. 5:24-cv-00717

**DECLARATION OF ANDREW C. PHILLIPS IN SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL PRODUCTION OF EVIDENCE RELEVANT TO PLAINTIFF'S
GOOD FAITH INTENTIONS AND ACTIONS**

I, Andrew C. Phillips, declare as follows

1. I am an attorney admitted, *pro hac vice*, to practice in this Court, and I am one of the lawyers responsible for representing Plaintiff Logan Paul in this action. I submit this declaration in support of Mr. Paul's Motion to Compel Production of Evidence Relevant to Plaintiff's Good Faith Intentions and Actions (the "Motion"). The following facts are within my personal knowledge and, if called and sworn as a witness, I would testify competently as to them.

2. On August 29, 2024, I caused to be served on Defendants—through their counsel—the requests for production reflected in Exhibit 1 to this Declaration.

3. Subsequently, in a series of e-mail communications, I asked Defendants to produce the materials that are the subject of the Motion.

4. On April 9, 2025, I participated in a conference call with Defendants' counsel, during which I again asked Defendants to produce the materials that are the subject of the Motion. Defendants declined to produce materials subject to The Motion.

5. On December 20, 2022, Defendants published a YouTube video about Mr. Paul and CryptoZoo titled, “The Biggest Fraud in Logan Paul’s Scam.”¹ Included in the video are portions of a recorded telephone call with Jake Greenbaum, who was an advisor to the CryptoZoo project and became a source for Defendant Findeisen’s reporting on CryptoZoo. During that telephone call, Mr. Greenbaum told Mr. Findeisen that CryptoZoo head of development Eddie Ibanez was “the biggest reason it failed.” He continued, “I don’t want it to ever be thought that Logan [Paul]’s the reason it failed. He’s not. Logan wasn’t smart enough for what he tried to build, and then when it was built and was failing, didn’t have the ability to correct it and save face and reputation.”²

6. Attached hereto as Exhibit 2 are portions of the transcript of the deposition of Luciano Schipelliti, taken in this case on March 18, 2025. Mr. Schipelliti, who was a community member and developer for the CryptoZoo project, and who also became a source for Defendant Findeisen’s reporting on CryptoZoo, testified that he expressly told Mr. Findeisen that Mr. Paul had good intentions for the CryptoZoo project and that the issues that doomed the project resulted from incompetence rather than any ill or fraudulent intent. Mr. Schipelliti further testified that Mr. Findeisen told Mr. Schipelliti that Mr. Findeisen agreed with that assessment. (L. Schipelliti Dep. Tr. at 75:17-85:15.)

7. Defendants have declined to produce the copies of the evidence in their possession that is the subject of the Motion.

¹ Coffeezilla, *The Biggest Fraud in Logan Paul’s Scam*, YouTube (Dec. 20, 2022), <https://www.youtube.com/watch?v=wvzyDg40-yw&list=PL4qw3AkxFDSNYGZAS84sPlQn20Ezcx8Ks&index=2>.

² *Id.* at 11:45-12:41.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 9, 2025

/s/ Andrew C. Phillips

Andrew C. Phillips